

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:	:	Case No. 18-21199 JAD
	:	
Delmas F. Fresh and April D. Fresh,	:	Chapter 13
	:	
Debtors,	:	Related Trustee Certificate of Default at
	:	Doc No. 78, and Order requiring
Delmas F. Fresh and April D. Fresh,	:	response at Doc No. 79.
	:	
Movants,	:	
	:	
vs.	:	
	:	
Ronda J. Winnecour, Trustee,	:	
	:	
Respondents.	:	
	:	

**NOTICE OF PROPOSAL TO CURE PLAN DEFAULT**

1. Debtors propose to cure the plan default as pleaded in the Trustee's Certificate of Default.
2. The cure shall be effected as follows: Debtor intends to increase plan payment in an amount necessary to cure plan arrears over the remaining 40 months of the plan term. Debtor's will file an amended plan on or before November 30, 2021.
3. All Objections to the proposed cure must be filed and served by no later than 21 days after the date of this Notice upon the Debtors and Chapter 13 Trustee. Untimely Objections will not be considered. Any creditor who files a timely Objection to the cure must appear at the scheduled Conciliation Conference on the proposed cure.
4. A virtual (via Zoom) Conciliation Conference on the proposed cure will be held on December 16, 2021, at 1:30 p.m., before the Chapter 13 Trustee. The table and meeting I.D., to participate by Zoom (and telephone number and meeting I.D. to participate by telephone if you lack the ability to participate by Zoom), can be found at <http://www.ch13pitt.com/calendar/> several days before the meeting. Parties are expected to familiarize themselves with the Trustee's website at <http://www.ch13pitt.com/> and to comply with the procedures set forth at the site for conference participation.

RESPECTFULLY SUBMITTED, this 10<sup>th</sup> day of November, 2021.

Zebley Mehalov & White, P.C.

By /s/ Daniel R. White

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